

Christian K. Vogel (Va. Bar No. 75537)  
LeClairRyan, A Professional Corporation  
Riverfront Plaza, East Tower  
951 East Byrd Street  
Richmond, Virginia 23219  
(804) 916-7198

*Counsel for G&S Livingston Realty, Inc.*

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

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In Re:	)	Chapter 11
	)	
CIRCUIT CITY STORES, INC., et al.,	)	Case No. 08-35653-KRH
	)	
Debtors.	)	(Jointly Administered)
	)	

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**MOTION FOR ADMISSION  
PRO HAC VICE OF STEPHEN V. FALANGA**

Christian K. Vogel ("**Movant**") hereby moves the Court, pursuant to Local Bankruptcy Rule 2090-1(E), to enter an order authorizing Stephen V. Falanga ("**Mr. Falanga**"), an attorney with the law firm of Connell Foley LLP, to appear pro hac vice in the referenced proceeding before the United States Bankruptcy Court for the Eastern District of Virginia (the "**Bankruptcy Case**") to represent G&S Livingston Realty, Inc., and in support of this Motion, the Movant states as follows:

1. Movant is a member in good standing of the Bar of the Supreme Court of Virginia and an attorney admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia.

2. Mr. Falanga is a member of good standing of the State Bars of New Jersey, New York, and the District of Columbia and is an attorney admitted to practice before the United States Supreme Court, United States District Court for the District of New Jersey, United States District Court for the Eastern District of New York, United States District Court for the Southern District of New York, and the United States Third Circuit Court of Appeals. There are no disciplinary proceedings pending against Mr. Falanga in any jurisdiction in which he is admitted to practice.

3. Movant requests that this Court authorize Mr. Falanga to file pleadings in, to appear and be heard at hearings concerning, and to otherwise participate in the Bankruptcy Case (and related proceedings) on behalf of G&S Livingston Realty, Inc.

4. Movant and his law firm shall serve as co-counsel with Mr. Falanga in the Bankruptcy Case (and related proceedings).

5. Notice of this Motion has been given to (a) the Office of the United States Trustee, (b) to counsel for the Debtor, and (c) all persons receiving electronic notice in the Bankruptcy Case as of the service hereof.

6. The Application to Qualify as a Foreign Attorney Under Local Bankruptcy Rule 2090-1(E)(2) is attached hereto as Exhibit A.

WHEREFORE, Movant respectfully requests that this Court enter an Order authorizing Stephen V. Falanga to appear pro hac vice in the Bankruptcy Case in substantially the same form as Exhibit B attached hereto and grant such other and further relief as is just.

/s/ Christian K. Vogel

Movant

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951 East Byrd Street  
Richmond, Virginia 23219  
(804) 916-7198

*Counsel for G&S Livingston Realty, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 15<sup>th</sup> day of April, 2013, a true and correct copy of the foregoing Motion for Admission Pro Hac Vice of Stephen V. Falanga was served on all persons receiving electronic notice in these cases, including:

Robert B. Van Arsdale  
Office of the United States Trustee  
701 East Broad St. Suite 4304  
Richmond, Virginia 23219  
*Assistant United States Trustee*

Stephen V. Falanga, Esq.  
Connell Foley LLP  
85 Livingston Avenue  
Roseland, New Jersey 07068  
*Counsel for G&S Livingston Realty, Inc.*

Lynn L. Tavenner  
Tavenner & Beran, PLC  
20 North Eighth Street, Second Floor  
Richmond, Virginia 23219  
*Counsel for Liquidating Trustee*

/s/ Christian K. Vogel

Movant

**EXHIBIT A**

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA

APPLICATION TO QUALIFY AS A FOREIGN ATTORNEY UNDER  
LOCAL BANKRUPTCY RULE 2090-1(E)(2)

In Case No.: 08-35653, \* Case Name In Re: Circuit City Stores, Inc., et al.

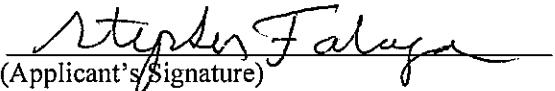
PERSONAL STATEMENT

FULL NAME (no initials, please) Stephen Vincent Falanga  
Bar Identification Number 82036 State New Jersey  
Firm Name Connelly Foley LLP  
Firm Phone # 973-535-0500 Direct Dial #  FAX # 973-535-9217  
E-Mail Address sfalanga@connellyfoley.com  
Office Mailing Address 85 Livingston Avenue, Roseland, New Jersey 07068  
Name(s) of federal court(s) in which I have been admitted U.S., DC, NJ, NY, D.N.J., EDNY, SDNY, Third Circuit

I certify that the rules of the federal court in the district in which I maintain my office extend a similar *pro hac vice* admission privilege to members of the bar of the Eastern District of Virginia.

I have not been reprimanded in any court nor has there been any action in any court pertaining to my conduct or fitness as a member of the bar.

I hereby certify that, within 90 days before the submission of this application, I have read the Local Rules of this Court and that my knowledge of the Federal Rules of Civil Procedure, the Federal Rules of Bankruptcy Procedure, and the Federal Rules of Evidence is current.

  
(Applicant's Signature)

I, the undersigned, do certify that I am a member of the bar of this Court, not related to the applicant; that I know the applicant personally, that the said applicant possesses all of the qualifications required for admission to the bar of this Court; that I have examined the applicant's personal statement. I affirm that his/her personal and professional character and standing are good, and petition the court to admit the applicant *pro hac vice*.

/s/ Christian K. Vogel April 15, 2013  
(Signature) (Date)

Christian K. Vogel  
(Typed or Printed Name)

\**Pro hac vice* admission in a case shall include an adversary proceeding(s) in the case.

Court Use Only:

The motion for admission is GRANTED \_\_\_\_\_ or DENIED \_\_\_\_\_

\_\_\_\_\_  
(Judge's Signature) \_\_\_\_\_  
(Date)

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*Counsel for G&S Livingston Realty, Inc.*

IN THE UNITED STATES BANKRUPTCY COURT  
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In Re:	)	Chapter 11
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CIRCUIT CITY STORES, INC., et al.,	)	Case No. 08-35653-KRH
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Debtors.	)	(Jointly Administered)
	)	

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**ORDER GRANTING MOTION FOR  
ADMISSION PRO HAC VICE OF STEPHEN V. FALANGA**

The matter came before the Court upon the Motion for Admission Pro Hac Vice of Stephen V. Falanga (the “Motion”) filed by Christian K. Vogel, seeking admission pro hac vice for Stephen V. Falanga, of the law firm of Connell Foley LLP, in the above-styled bankruptcy case (the “Bankruptcy Case”) pursuant to local Bankruptcy Rule 2090-1(E). After review of the Motion and statements therein, the Court finds that adequate notice of the Motion has been provided, no other or further notice is necessary or required, and it is appropriate that Stephen V. Falanga be authorized to practice pro hac vice before the Court in this Bankruptcy Case, it is hereby

ORDERED as follows:

1. The Motion be and hereby is granted.

2. Stephen V. Falanga, of the law firm of Connell Foley LLP, is hereby admitted to appear in this Bankruptcy Case and any related proceedings pro hac vice pursuant to Local Bankruptcy Rule 2090-1(E)(2) on behalf of G&S Livingston Realty, Inc.

ENTERED:

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UNITED STATES BANKRUPTCY JUDGE

I ASK FOR THIS:

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Christian K. Vogel (Va. Bar No. 75537)  
LeClairRyan, A Professional Corporation  
Riverfront Plaza, East Tower  
951 East Byrd Street  
Richmond, Virginia 23219  
(804) 916-7198

*Counsel for G&S Livingston Realty, Inc.*

**RULE 9022-1 CERTIFICATION**

I hereby certify that the foregoing has either been endorsed by or served upon all necessary parties.

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Movant

**SERVICE LIST**

Robert B. Van Arsdale  
Office of the United States Trustee  
701 East Broad St. Suite 4304  
Richmond, Virginia 23219

*Assistant United States Trustee*

Stephen V. Falanga, Esq.  
Connell Foley LLP  
85 Livingston Avenue  
Roseland, New Jersey 07068

*Counsel for G&S Livingston Realty, Inc.*

Lynn L. Tavenner  
Tavenner & Beran, PLC  
20 North Eighth Street, Second Floor  
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*Counsel for Liquidating Trustee*